



CHEMICAL MANUFACTURERS ASSOCIATION

February 6, 1995

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Mr. Charles M. Auer
Director
Existing Chemical Assessment Division
Environmental Protection Agency
WSM E415, TS-778
401 M Street, S.W.
Washington, D.C. 20460

Contains No CBI

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Dear Charlie,

The Chemical Manufactures Association (CMA) appreciates the opportunity to freely discuss with you its views on the TSCA Section 4 rule for Hazardous Air Pollutant (HAP) chemicals which will be proposed shortly.

In conversations with you and Gary Timm, CMA has indicated its interest in convening a small informal meeting with key industry and Agency representatives to discuss generic issues likely to be relevant to the rule. We believe that this meeting could contribute substantially to the development of a process which would supply the Agency with the information it needs to fulfill its obligations under the 1990 Clean Air Act Amendments while not imposing an unreasonable burden on chemical manufacturers. This discussion will focus on topics such as the process for conducting an effective post-proposal dialogue on issues relevant to the rule, and more substantive issues such as alternative processes for accomplishing Agency objectives.

There are several times when key CMA representatives could meet with the Agency on this issue. Depending on your availability and that of others, I propose convening a meeting on February 22, 1995, or the afternoon of February 23. Please contact me as soon as possible to confirm availability or propose other dates.

CMA believes it is important for both industry and the Agency to understand and clearly define issues of relevance to this rule, and we welcome the opportunity to discuss this matter further.

Sincerely,

Sarah Doelp
Associate Director
Product Stewardship



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cc: Ken Moss/EPA Langley Spurlock/CMA Susan Conti/CMA Gary Timm/EPA
Jim Quance/Exxon Chemical Bob Hagerman/Dow Chemical